

1 MICHAEL A. JACOBS (CA SBN 111664)
2 MJacobs@mofo.com
3 ARTURO J. GONZÁLEZ (CA SBN 121490)
4 AGonzalez@mofo.com
5 MORRISON & FOERSTER LLP
6 425 Market Street
7 San Francisco, California 94105-2482
8 Tel: 415.268.7000 / Fax: 415.268.7522

9 KAREN L. DUNN (*Pro Hac Vice*)
10 kdunn@bsfllp.com
11 HAMISH P. M. HUME
12 hhume@bsfllp.com
13 BOIES SCHILLER FLEXNER LLP
14 1401 New York Avenue, N.W.
15 Washington, D.C. 20005
16 Tel: 202.237.2727 / Fax: 202.237.6131

17 WILLIAM CARMODY (*Pro Hac Vice*)
18 bcarmody@susmangodfrey.com
19 SUSMAN GODFREY LLP
20 1301 Avenue of the Americas, 32nd Floor
21 New York, NY 10019-6023
22 Tel.: 212.336.8330 / Fax.: 212.336.8340

23 Attorneys for Defendants
24 UBER TECHNOLOGIES, INC. and OTTOMOTTO LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

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UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
MOTION IN LIMINE NO. 2 AND
WAYMO'S BRIEF IN OPPOSITION
THERETO**

Judge: The Honorable William Alsup
Trial Date: October 10, 2017

1 Pursuant to N.D. Cal. Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies,
 2 Inc. and Ottomotto LLC (collectively, “Uber”) submit this administrative motion for an order to
 3 file under seal certain exhibits to Defendants’ Motions *in Limine* No. 2 and Waymo’s Brief in
 4 Opposition to Defendants’ Motion *in Limine* No. 2. Specifically, Uber requests an order granting
 5 leave to file under seal the confidential portions of the following:

6 Document	7 Portions to Be Filed Under Seal	8 Designating Party
9 Exhibit 4 to the Declaration of Martha L. Goodman in Support of Defendants’ Motions In Limine Nos. 2 and 22-25 (“Goodman Decl.”)	10 Entire Document	11 Plaintiff

12 The entirety of Exhibit 4 to the Goodman Decl. contains information that Waymo
 13 designated or considers “Confidential” and/or “Highly Confidential – Attorneys’ Eyes Only”
 14 pursuant to the Protective Order in this case, or that Waymo asked Uber to file under seal. (See
 15 Goodman Decl. ¶ 3.)

16 Defendants served Waymo LLC with this Administrative Motion to File Documents
 17 Under Seal on September 13, 2017.

18 For the foregoing reasons, Defendants request that the Court enter the accompanying
 19 Proposed Order granting Defendants’ Administrative Motion to File Documents Under Seal and
 20 designate the service copies of these documents as “HIGHLY CONFIDENTIAL –
 21 ATTORNEYS’ EYES ONLY.”

22 Dated: September 13, 2017

23 BOIES SCHILLER FLEXNER LLP

24 By: /s/ Karen L. Dunn
 25 Karen L. Dunn

26 *Counsel for Defendants*
 27 UBER TECHNOLOGIES, INC. AND
 28 OTTOMOTTO LLC